

A47 North Tuddenham to Easton Dualling

Scheme Number TR010038

Volume 8

**8.6 Statement of Common Ground
Broadland District Council**

The Infrastructure Planning (Examination Procedure) Rules 2010
Rule 8(1)(e)

Planning Act 2008

~~January~~ February 2022

Infrastructure Planning

Planning Act 2008

**The Infrastructure Planning
(Examination Procedure) Rules 2010**

**A47 North Tuddenham to Easton
Development Consent Order 202[x]**

**STATEMENT OF COMMON GROUND -
BROADLAND DISTRICT COUNCIL**

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Rev.0	March 2021	Draft for DCO Application
Rev.1	November 2021	Deadline 4 Issue
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<u>Rev.3</u>	<u>February 2022</u>	<u>Deadline 9 Update with New NH Signature</u>

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared and agreed by (1) Highways England Company Limited and (2) Broadland District Council.

Signed

Chris Griffin ~~Glen Owen~~

Programme Leader ~~Senior Project Manager~~

on behalf of National Highways Limited ~~(formerly Highways England)~~

Date: 07 February 2022 ~~30 November 2021~~

Signed.....

Charles Judson

Principal Planning Officer

on behalf of Broadland District Council Date: 29 December 2021

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1 INTRODUCTION

1.1 Purpose of this Document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed A47 North Tuddenham to Easton ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All Application documents are available on the Planning Inspectorate website.
- 1.1.3 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Highways England (HE) as the Applicant and (2) Broadland District Council (BDC).
- 1.2.2 Highways England became the Government-owned Strategic Highways Company on 1 April 2015. It is the highway authority in England for the strategic road network and has the necessary powers and duties to operate, manage, maintain and enhance the network. Regulatory powers remain with the Secretary of State. The legislation establishing Highways England made provision for all legal rights and obligations, including in respect of the Application, to be conferred upon or assumed by Highways England.

1.2.3 As per the notification to the Examining Authority in the Applicant's Deadline 5 submission cover letter (REP5-001), on 8 September 2021 (during the course of the Examination) Highways England Company Limited changed its name to National Highways Limited. The Applicant's company number and registered office remains the same.

1.2.4 The Applicant has amended the dDCO (and Explanatory Memorandum) to reflect the change of name, but the Applicant continues to use Highways England branding where appropriate. This is to ensure consistency within the application and to avoid the need for a wasteful and unnecessary exercise of arranging to have all documentation re-issued and re-branded in the new company name.

1.2.5 BDC is responsible for housing, leisure and recreation, environmental health, waste collection, planning, economic growth and local taxation collections.

1.3 Terminology

1.3.1 In the table in the Issues section of this SoCG:

- “Agreed” indicates area(s) of agreement
- “Under discussion” indicates area(s) of current disagreement where resolution remains possible, and where parties continue discussing the issue to determine whether they can reach agreement by the end of the examination
- “Not agreed” indicates a final position for area(s) of disagreement where the resolution of divergent positions will not be possible, and parties agree on this point.

1.3.2 In this SoCG, the issues raised by the Council are presented alongside a response from Highways England. “Agreed” signifies that there is agreement between the parties that there are no further points to discuss as regards that particular issue, and the Council is satisfied by the Highways England response.

1.3.3 It can be assumed that any matters not specifically referred to in the Issues section of this SoCG are not of material interest or relevance to BDC, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to BDC.

2 RECORD OF ENGAGEMENT

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Broadland District Council in relation to the Application is outlined in Table 2.1. Names of personnel involved below are provided in Appendix A.

Table 2-1 - Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
March and April 2017	Public consultation material	Non-statutory public consultation on the route options.
21/10/2019	Email attached to PINS Scoping Opinion	Comments on proposed Scoping Opinion on the EIA received from Broadland District Council and South Norfolk Council jointly.
November and December 2019	Emails	Consultation with Landscape Architect at Broadland District Council on representative viewpoint locations for the visualisations.
February 2020	S42 1B consultation material	Statutory consultation material sent.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
Statutory Consultation		
February and March 2020	Email	Proposal for undertaking baseline noise survey in the area of the Proposed Scheme with monitoring locations and survey methodology outlined. No comments or issues raised by Environmental Protection Officer at Broadland Council. The baseline noise survey was undertaken in September 2020.
Received before end of consultation (April 2020)	Online comment	A consultation response from Broadland District Council online stating their support to the scheme with a few considerations detailed in the issues section.
February and March 2020	Email	Consultation emails to agree scope of human health assessment with a follow up call made. Responses from Broadland District Council were received. As a result, village of Honingham and Weston Longville have been included with more precise location of Upper Wensum valley.
18/08/2020	Email	James Powis (HE) shared the design draft for stakeholder consideration following feedback from the Statutory Consultation. This was sent for information only and not for comment. Sent to Trevor Holding, Helen Mellors, Phil Courtier and the planning department inbox.
09/11/2020	Meeting	Meeting to discuss access to Food Enterprise Park including Blind Lane. This was addressed and concerns recorded.
13/11/2020	Email	Phil Courtier's email 13-11-20 regarding Food Enterprise Park. Follow up action by James Powis.
17/11/2020 (Meetings held quarterly throughout 2020)	Meeting through Microsoft Teams	<p>Meeting held between Highways England, Norfolk County Council, Broadland District Council, Breckland District Council and South Norfolk Council: Discussed the Statement of Common Grounds preparation, Food Enterprise Park access, the Local Liaison Group meetings and the new joined up approach, the draft design changes following stat con feedback, draft plan proposals for Walking Cycling and Horse Riding, the updated Lagoon strategies & drainage proposals and the A47 North Tuddenham to Easton update brochure planned for distribution this December.</p> <p>Attendees include: James Powis (HE), Edwin Bechtle (HE), Glen Owen (HE), Philippa Harris (HE), Phil Courtier, David Cumming and Stephen Scowen.</p>
2020 and 2021	Email	Consultation with Broadland District Council to confirm the approach and identify any additional projects to be considered in the Cumulative Effects Assessment. Additional projects were added as a result.

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
July 2021	Relevant Representation to the Planning Inspectorate (PINS)	Submission of comments by the Council on DCO application documents to PINS.
27 August 2021	Email	Updated draft Statement of Common Ground issued to the Council
02 September 2021	Call	Meeting between Highways England and the Council to discuss draft Statement of Common Ground
07 September 2021	Email	Post meeting updated draft Statement of Common Ground issued to the Council
29 September 2021	Email	Comments on draft Statement of Common Ground issued by the Council
25 October 2021	Email	Amended Statement of Common Ground issued to the Council for final review before Deadline 4 submission
11 November 2021	Teams meeting	Meeting between Highways England and the Council Officers to agree final changes to Statement of Common Ground before submission at Deadline 4
11 November 2021	Email	Email the Council recording changes post above meeting to confirm changes
15 November 2021	Email	Email confirmed agreement of a position statement by the Council with regards the FEZ and the DCO application.
23 November 2021	Phone call	Air quality specialist and Council's Environmental Management Officer discussed SoCG air quality statement to reach an agreement.
30 November 2021	Email	Highways England issued updated SoCG for Council acceptance and signing.
29 December 2021	Email	Signed final SoCG received from the Council.

2.1.1 It is agreed that this is an accurate record of the key meetings and other forms of consultation and engagement undertaken between (1) Highways England and (2) Broadland District Council in relation to the issues addressed in this SoCG.

3 ISSUES

3.1 Purpose of this Document

- 3.1.1 Section 3.1 summarises the key issues explored between BDC and Highways England, whilst the issues are explored in more detail in Section 3.2.
- 3.1.2 Appendix C to this SoCG contains a copy of Highways England's submit responses to the BDC's relevant representations referenced in the below table and submitted at the DCO Examination Deadline 1.
- 3.1.3 Appendix D presents a copy of Highways England's comments on BDC's responses to the Examining Authority's questions submitted at the DCO Examination Deadline 2, which covered the following topics in relation to the Applicant's DCO application:
- Environmental Statement:
 - Chapter 5 Air quality
 - Chapter 6 Historic Environment
 - Chapter 7 Landscape and Visual Effects
 - Chapter 8 Biodiversity (including Habitats Regulations Assessment)
 - Chapter 10 Material Assets and Waste
 - Chapter 11 Noise and Vibration
 - Chapter 12 Population and Human Health
 - Chapter 13 Road Drainage and the Water Environment
 - Chapter 14 Climate
 - Chapter 15 Cumulative Effects Assessment
 - Traffic and Transport
 - Case for the Scheme Transport Assessment

- Traffic Management Plan
 - Great Norwich Food Enterprise Zone Local Development Order
 - Draft Development Consent Order (DCO)

3.2 Summary of Council Issues

Ref. No.	Topic	Status	Date Agreed
1	Supporting the areas' economy	Agreed	16/06/21
2	Highway access to the Food Enterprise Park (FEP)	Agreed	30/11/21
3	Wood Lane	Agreed	25/02/21
4	Air quality and noise	Agreed, subject to controls under DCO Requirements	11/11/21
5	Air quality	Agreed	30/11/21
6	Noise and vibration	Agreed, subject to controls under DCO Requirements	11/11/21
7	Flooding at the culvert crossing Hall Drive in Honingham	Agreed, subject to NCC approval	25/02/21
8	Private drinking water supplies	Agreed, subject to controls under DCO Requirements	11/11/21
9	Heritage assets	Agreed, subject to controls under DCO Requirements	11/11/21
10	Landscape and visual impact	Agreed	01/09/21
11	Landscape and visual effects	Agreed, subject to controls under DCO Requirements	11/11/21
12	Landscape design	Agreed, subject to controls under DCO Requirements	11/11/21
13	Further comments	Agreed	01/09/21

3.3 Council Issues in Detail

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
1	Supporting the area's economy	Appendix C to this SoCG Relevant Representation to PINS, July 2021	Broadland District Council (BDC) welcomes the scheme proposals which help to support the economy and economic growth in the area. The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk seeks to enhance the transport system in order to develop the role of Norwich as a Regional Transport Node. This is to be achieved by, amongst other things, promoting improvements to the A47. This strategic aim is echoed in the emerging Greater Norwich Local Plan (GNLP), which supports strategic infrastructure improvements that support the growth needs of the area. The emerging GNLP specifically refers to improvements to the A47 between North Tuddenham and Easton as one of the schemes that will help the plan achieve its aims. As such, the North Tuddenham to Easton dualling scheme is given in principle support by the existing and emerging development plan.	By delivering these improvements, Highways England aims to: <ul style="list-style-type: none"> • help enable regional development and growth in Norwich and its surrounding area • reduce congestion, make journey times more reliable and provide capacity for future traffic growth • improve resilience of the road to cope with incidents such as collisions, breakdowns and maintenance • improve safety for all road users and those living in the local area • protect the environment by minimising any adverse impacts and where possible, deliver benefits • ensure the new road layout considers local communities and safe access to the A47 • provide a safer route between communities for walkers, cyclists, horse riders and other non-motorist groups. 	Agreed	16/06/21
2	Highway access to the Food Enterprise Park (FEP)	2020 Statutory consultation representation from BDC and South Norfolk Council (SNC)	The location and form of the repositioned Easton roundabout at the junction with Blind Lane will potentially provide excellent access to the FEP. However, the scheme does not currently facilitate an access to the FEP and nor does it continue to provide access to Blind Lane which has not yet been	Highways England agrees that through the project aims the scheme supports economic growth and the potential for other local developments that are deemed feasible by the local planning authority and affected district councils. Highways England has outlined its position and reason for not providing a connection to Blind	Agreed	15/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
		<p>Relevant Representation to PINS, July 2021</p> <p>Appendix D to this SoCG</p>	<p>closed, nor are there any current plans to close this road. Therefore, whilst the proposed junction is an integral element of delivering the FEP vision in its entirety it remains unclear how this element of the vision can be delivered.</p> <p>Though BDC don't 'support' the FEP access not being included in the Applicant's scheme, BDC accept the Applicant's position and rationale, so now want to ensure that all parties work together to try and get the FEP access delivered to ensure cost efficiencies and minimise disruption as far as possible.</p>	<p>Lane in Section 9.3 of the Scheme Design Report (TR010038/APP/7.3) on the access and egress of the Food Enterprise Zone (FEZ) from the A47.</p> <p>The proposed scheme closes Blind Lane to through traffic following statutory consultation feedback. There is no existing or contingent requirement that the LDO requires the Greater Norwich FEZ site to be accessed directly from the A47 given the approved alternative route along Church Lane. Food Enterprise Zone (FEZ) traffic will access the A47 via the new Norwich Road junction link to Dereham Road, Easton, as per the controls on FEZ related traffic under its respective Local Development Order with Broadland District Council. The LDO analysis is set out in Section 9.3 of the Scheme Design Report and the removal of Blind Lane post statutory consultation is reported in Table 4.12 (item no. 12) of the Consultation Report.</p> <p>The FEZ developer was invited to contribute funds to the Scheme to provide a private direct connection to the FEZ, but as no offer was received before design was fixed for the DCO assessments so the Blind Lane connection remained removed from the Scheme design.</p> <p>However, the Applicant acknowledges that the developer of the FEZ site may wish to obtain consent to create their own connection to the Scheme in the future. Therefore, A47 Scheme's traffic modelling has taken this into account at the Norwich Road junction to provide capacity for the FEZ vehicle movements. The design of the Honingham roundabout to Norwich Road</p>		

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
				<p>junction side road would allow for a third party to create a new highway connection. This commitment is presented in Section 9.3 of the Scheme Design Report, Rev.1 (AS-009).</p> <p>The Applicant notes that the promoters of the FEZ have now lodged a planning application (27th July 2021) with the Local Planning Authority, Broadland District Council (Application No.: 20211335) for the provision of an access to the A47 Scheme.</p> <p>Highways England will continue to engage with the Norfolk County Council, the District Council and the developer in regard to the access.</p> <p>Further to the above, the Applicant has determined that the LDO made on 31 October 2017 required a vehicular access route to the FEP to be approved prior to commencement of development pursuant to condition 2.20 of the LDO as well as the closure of Blind Lane. The route via Church Lane was approved by Broadland District Council on 21 December 2018 and has therefore been the intended route since that date. As such, there is no requirement for the Scheme to provide an access over and above what has been approved to-date by BDC.</p> <p>The Applicant notes that developers of the FEP have submitted a separate planning application for access into the FEP and to tie in with the A47.</p> <p>The Applicant will continue to work with the promoters of the FEP and other interested parties, including the local planning and highways authorities, to explore opportunities to work with the FEP's contractor to construct the</p>		

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
				access alongside the construction A47 North Tuddenham to Easton scheme, to secure cost efficiencies and minimise disruption, provided that agreement can be reached between the parties in respect of all relevant matters, and all necessary permissions are secured.		
3	Wood Lane junction and Norwich Western Link (NWL)	2020 Statutory consultation representation from BDC and SNC	The position and form of the proposed Wood Lane junction is welcomed since it will provide excellent access to the proposed NWL which is an integral element of the wider growth agenda.	Highways England agrees that through the project aims the scheme supports economic growth and the potential for other local developments that are deemed feasible by the local planning authority and affected district councils.	Agreed	25/02/21
4	Air quality and noise	2020 Statutory consultation representation from BDC and SNC & Response to EIA Scoping Report Appendix B to this SoCG Relevant Representation to PINS, July 2021	Concerned about the impact of construction machinery (e.g. pumps and generators) close to sensitive receptors. Whilst the project is in a predominantly rural area, the scheme has the potential to impact on the amenity of local residents during the construction and operational phases as a result of noise, emissions and vibration. Although the Council raises no specific issues on these matters at this stage, we may wish to make representations on these issues through the examination process and ensure that these issues are adequately addressed in the Development Consent Order.	The effects on amenity of local residents during the construction and operational phases as a result of noise, emissions and vibration and associated mitigation requirements have been considered in the following chapters of the Environmental Statement (ES): <ul style="list-style-type: none"> Chapter 5 - Air quality Chapter 11 - Noise and vibration Chapter 12 - Population and human health Chapter 13 - Road drainage and the water environment Chapter 14 - Climate Chapter 15 – Cumulative Effects Assessment. An Environmental Management Plan (EMP) has been completed and submitted as part of the DCO application. The EMP outlines construction mitigation measures to reduce the impact of construction noise and dust. With the application	Agreed, subject to controls under DCO Requirements	11/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
				of best practice construction methods and temporary noise barriers, potential significant effects are unlikely at the vast majority of receptors. The EMP is secured through Requirement 4 of the draft DCO (REP2-005).		
5	Air Quality	2021 Deadline 2 Council ExQ1 Response Appendix D to this SoCG	Given the evolving but uncertain position and the focus now on reducing long term average concentrations of PM2.5 the Council is of the opinion that it would be helpful if the applicant could use modelling to demonstrate the impact, if any, of the proposed development for this pollutant.	ES Chapter 5 Air Quality (APP-045) has provided full details of the assessment methodology and conclusions, including us of modelling to demonstrate the impact of the Scheme for this pollutant. The dispersion modelling of the baseline PM10 has shown that the predicted concentrations are significantly below the Air Quality Objective (AQO), and thus following DMRB methodology there is no need to further assess this pollutant. This model has been fully verified following LAQM TG(16). PM2.5 makes up around 60% of PM10 dependent on the source of the emissions. The ES has shown that there is no risk to the PM10 objective being exceeded even if all of the PM10 was PM2.5 the modelling confirms that there is also no risk to the current PM2.5 AQO and therefore, there is no requirement to undertake further monitoring. It is acknowledged that the PM10/PM2.5 limit values are due to change under the new Environment Bill. However, as these change have not yet been confirmed, it is not possible to assess against a potential new standard that may or may not come into force. Therefore, Highways England's assessment follows current DMRB guidance.	Agreed	30/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
6	Noise and Vibration	Appendix D to this SoCG	Comments in relation to the approach and outcome of the noise impact assessment.	Responses provided in Appendix D to comments posed in response to the following ExA's First Written Questions on ES Appendix 11.4, ES Chapter 11, Merrywood House, First and Hall Farm: 12.0.1; 12.0.2; 12.0.3; 12.0.6; 12.0.10; 12.0.12; and 13.0.1.	Agreed, subject to controls under DCO Requirements	11/11/21
7	Flooding at the culvert crossing Hall Drive in Honingham	2019 Statutory consultation representation from BDC and SNC	The culvert that runs along the Village Hall access road and crosses Hall Drive in Honingham surcharges and floods in wet weather. Highways England must ensure that flooding is not made worse by the proposals.	The flooding issues within Honingham are understood to be a result of existing overland flow pathways coming from the north side of the existing A47 and resulting in flooding in the vicinity of Honingham. The Scheme will intercept overland runoff north of both the existing A47 and proposed new A47 through provision of pre-earthworks drainage. This runoff will then be diverted below the mainline and taken east to an outfall into the River Tud adjacent to the existing structure over the River Tud. Environmental Statement Appendix 13.2 - Drainage Strategy Report documents the drainage strategy and selection process, demonstrating compliance with technical standards. Drainage network designs have been checked for exceedance events of 1 in 100 year with 40% rainfall climate change allowance. Any additional discharge is shown to be volumetrically minimal and should be retained within the highway boundaries, and eventually routed back into the drainage networks once the extreme event has receded. Therefore, the residual flood risk to others is considered to be low.	Agreed, subject to approval of Norfolk County Council as Lead Local Flood Authority.	25/02/21
8	Private drinking	2020 Statutory consultation	With reference to domestic, private drinking water supplies, the Councils	Domestic, private drinking water supplies have been assessed in terms of any potential for	Agreed, subject to	11/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
	water Supplies	representation from BDC and SNC	hold records for a number of these supplies and sample them for drinking water quality. It is not anticipated that the risk of pollution to domestic supplies is great but we feel the applicant should demonstrate that this is the case.	<p>pollution. The results of the assessment are reported within the Road Drainage and Water Environment chapter of the Environmental Statement (Application document TR0100038/APP/6.1).</p> <p>At the detailed design stage, the Applicant will undertake a water features survey to confirm the details of unlicensed abstractions and additional water features (including additional abstractions) in the vicinity of construction works. The Drainage Strategy (APP-126 and APP-127) has considered groundwater pollution risk (HEWRAT) and mitigation has been proposed. Delivery of this commitment is specified in actions RD3 and RD5 in Table 3.1: Record of Environmental Actions and Commitments of the Environmental Management Plan (APP-143) which will be delivered under dDCO (REP2-005) Requirement 4.</p>	controls under DCO Requirements	
9	Heritage assets	<p>2020 Statutory consultation representation from BDC and SNC</p> <p>Relevant Representation to PINS, July 2021</p>	<p>In terms of heritage assets within the scheme plan, there are listed buildings in very close proximity to the proposed works in both Broadland & South Norfolk Council areas which will be adversely affected by the proposals. These include:</p> <ul style="list-style-type: none"> i. St Peters Church, Easton which is Grade I listed, ii. St Andrews Church, Honingham which is Grade II* listed, and iii. Church Farm & Church House Farm which are both Grade II listed 	<p>Highways England have reviewed this feedback and have relocated the Blind Lane / Taverham Road junction further east to reduce any impact on the setting of St Andrews Church Honingham.</p> <p>Mitigation measures have been proposed within the design of the scheme to reduce the setting impact at St Peter's Church through methods of green noise screens.</p> <p>The landscape masterplan for the scheme has been designed to reduce the setting impacts at St Andrew's Church and Church Farm and Church House. Highways England welcomes the Council's support that the diversion of the A47 will be beneficial to the setting of St</p>	Agreed, subject to controls under DCO Requirements	11/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
			<p>The Council has given a view on the heritage assets that are likely to be affected for inclusion in the applicants' heritage assessment. However, the Council has not seen any quantification or assessment of the level of harm to those heritage assets or mitigation required. Significant harm will result that may not be possible to mitigate.</p> <p>Our concern will be that the proposals will affect the setting of the stated listed buildings and the decision maker should, as required by Section 66 (1) of the Planning (Listed Buildings & Conservation Areas) Act 1990, have special regard to the desirability of preserving the setting of the building or any features of special architectural or historic interest which it possesses.</p> <p>Relevant Representations were submitted stating the Council agrees the Scheme would have a large adverse impact on St Andrew's Church, a Grade II* listed building. However, the Council notes that the existing pedestrian access into the church yard from a footpath does not appear to be designed for retaining pedestrian access through the lychgate. The Council consider this an important issue when considering consequential changes around the church in relation to access to the church.</p>	<p>Andrew's Church and proposal to protect the milestones during the construction of the Scheme.</p> <p>The results of the assessment of these heritage assets are reported within the Cultural Heritage chapter of the Environmental Statement (Application document TR0100038/APP/6.1). Appendix C to this SoCG contains a copy of Highways England's submit responses to the Council's relevant representations.</p>		

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
			<p>In the Cultural and Heritage section of the ES, the applicants have not included a C19 lodge to Honingham Hall (to the east of St Andrew's Church) which the Council considers to have sufficient heritage and architectural interest to be a non-designated heritage asset. However, the Council considers that the diversion of the road will be beneficial to the setting of this building so is not a cause of concern.</p> <p>The Council supports the proposed protection of milestones during the construction of the Scheme.</p>			
10	Landscape and visual impact	<p>2020 Statutory consultation representation from BDC and SNC</p> <p>Relevant Representation to PINS, July 2021</p>	<p>The Council has commented on the proposed viewpoints and additional viewpoints have been suggested by us. The scheme will likely have significant impacts on the landscape character and significant visual impacts. The application will need to be submitted with a landscape visual impact assessment that quantifies and assesses the level of harm and mitigation required to reduce the harm. The Council agrees there would be a significant adverse effects landscape character and visual amenity within the Broadland section of the Scheme, but the mitigation is expected to reduce this within 15 years to not be significant.</p>	<p>A Landscape and visual effects assessment (Chapter 7 of the ES) has been completed and submitted as part of the DCO application. This chapter presents an assessment on the agreed viewpoints with the Council. Mitigation measures have been proposed to reduce identified significant effects and an Environmental Masterplan has been produced to illustrate the mitigation measures.</p>	Agreed	01/09/21
11	Landscape and visual	Appendix D to this SoCG	Requested information about the likely species within each category of	See response to 10.0.13 in Appendix D to this SoCG. The assumptions around tree heights are	Agreed, subject to	11/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
	effects		hedgerow as there could be exceptions to the heights suggested.	considered reasonable as planting growth is not an exact science and trees will be planted at different specifications (i.e. size and nursery growth type) to ensure variety. In addition, different species of trees demonstrate different growth rates and the varying ground and climatic conditions throughout the site will give rise to further differences in the growth rates that will be achieved. However, it is safe to assume that after 15 years areas of proposed woodland trees, which comprise the majority of the proposed tree planting, will reach an approximate 8m in height. This assumes an approximate height of 0.6m when planted and a subsequent growth rate of 0.5m per annum. Additional detail regarding the planting types and sizes (heights) will be considered further when developing the final landscaping design under DCO Requirement 5 'Landscaping' (REP2-005) and the detailed Landscape and Ecology Management Plan (LEMP), which forms Appendix B.5 of the Environmental Management Plan (APP-143), during the detailed design stage prior to construction.	controls under DCO Requirements	
12	Landscape design	Relevant Representation to PINS, July 2021	The Council welcomes that the submission has identified where 'important' (and other) hedgerows will be lost as a result of the scheme. Where it is necessary to remove sections of 'important' hedgerows and the 'importance' was due to an historical line, it would be preferable to have the line re-instated after construction by	The final design of landscape features and planting, including mitigation for hedgerow and tree loss, will be developed during detailed design stage in consultation with the relevant local planning authority and presented in an updated Environmental Masterplan. Tree protection measure would also be implemented through the final Environmental Management Plan. Delivery of the commitments in the final Environmental Masterplan and Environmental	Agreed, subject to controls under DCO Requirements	11/11/21

Ref. No.	Issues	Document References (if relevant)	Broadland District Council Position	Highways England Position	Status	Date Agreed
			<p>replanting (if the original form of the land is unchanged).</p> <p>There is inevitable tree loss as a result of this scheme which is impossible to avoid in such a landscape. The Council are pleased to see that whilst some category 'A' trees are scheduled for removal, no Veteran trees appear to be implicated. The Council are concerned about potential construction compounds being within root protection areas of retained trees (including category As); would like to see this avoided if at all possible.</p> <p>The sensitive design and integration of hard landscape features, such as barriers requires careful consideration. Notwithstanding the highway maintenance requirements, it would be preferable for fencing in more visible locations to be set with planting that will soften the built elements.</p>	<p>Management Plan will be secured through Development Consent Order Requirements 4 'Environmental Management Plan' and 5 'Landscaping'</p>		
13	Further Comments	N/A	<p>Broadland District Council is strongly supportive of the scheme in principle subject to further consideration of the issues identified above. The Council wishes to continue to work pro-actively with the applicants as the application is progressed through to Examination to try to resolve any issues in respect of the above.</p>	<p>Highways England will continue to engage with Broadland District Council to submit this Statement of Common Ground to inform the Planning Inspector and will agree a final issue before the end of the Development Consent Order Examination process.</p>	Agreed	01/09/21

APPENDIX A – INDIVIDUALS INVOLVED IN CORRESPONDENCE

Name	Role or Discipline	Organisation
Phil Courtier	Director of Place, People & Resource	Broadland District Council
Trevor Holden	Managing Director	Broadland District Council
Helen Mellors	Assistant Director Planning	Broadland District Council
Richard Squires	Senior Community Planning Officer	Broadland District Council
Charles Judson	Principal Planning Officer	Broadland District Council
Glen Owen	Senior Project Manager	Highways England
James Powis	Project Manager	Highways England
Edwin Bechtle	Assistant Project Manager	Highways England
Philippa Harris	Project Support Officer	Highways England
Michael Robinson	DCO Lead	Sweco UK Ltd

APPENDIX B – TABLE CONTAINING RECORDS OF WATER SUPPLIES THAT ARE WITHIN 1000M OF THE EXISTING ROUTE

Property	Easting	Northing	Type
Church Farm House	611738	311294	BHW
Brooke House, Church Farm	611738	311294	BHW
Church Farm House	611738	311294	WEL
Wood Farm	610102	313656	BHW
Church Farm Barn East	611798	311328	BHW
Grange Farm	609489	311215	BHW
Greenacres Farm	610284	310834	BHW
66 Church Farm Cottages	611822	311393	WEL
White Gables	610068	311570	BHW
Red Barn Cottage	611837	310324	BHW
The Barn	610284	310834	BHW

Type:

WEL =Well

BHW =Borehole

APPENDIX C – APPLICANT’S RESPONSES TO THE COUNCIL’S RELEVANT REPRESENTATIONS AT DEADLINE 1

Reference	Relevant Representation	Highways England Response
RR-041.1	<p>This letter sets out Broadland District Council’s Relevant Representation in respect of the application made by Highways England for a Development Consent Order for alterations to a section of the A47 between North Tuddenham and Easton (the Scheme). The adopted Joint Core Strategy for Broadland, Norwich and South Norfolk seeks to enhance the transport system in order to develop the role of Norwich as a Regional Transport Node. This is to be achieved by, amongst other things, promoting improvements to the A47. This strategic aim is echoed in the emerging Greater Norwich Local Plan (GNLP), which supports strategic infrastructure improvements that support the growth needs of the area. The emerging GNLP specifically refers to improvements to the A47 between North Tuddenham and Easton as one of the schemes that will help the plan achieve its aims. The Regulation 19 Publication of the GNLP was undertaken between 1 February 2021 and 22 March 2021 and is anticipated to be examined between November and December 2021 and adopted in September 2022. As such, the North Tuddenham to Easton dualling scheme is given in principle support by the existing and emerging development plan.</p>	<p>The Applicant acknowledges the Council’s comments, which reflect the benefits and the planning policy review presented in the Case for the Scheme (APP-140).</p> <p>The following responses seek to address the concerns raised by the Council.</p>
RR-041.2	<p>The potential for the scheme to deliver economic growth is strongly supported by the District Council. These benefits, in combination with the wider programme of A47 improvements being proposed by Highways England, include:</p> <ul style="list-style-type: none"> • help to boost the economic prosperity of a large part of the East of England and contribute to national economic growth. • Shorter and more reliable journey times along the road and onwards to the Midlands. • Reduce delay, congestion and inefficiency. • Attracting more customers for businesses and attracting new businesses. • supporting existing businesses to grow and become more productive and profitable. • allowing businesses to invest with confidence. • encouraging more visitors to the region. • creating more jobs. 	
RR-041.3	<p>However, whilst the District Council is supportive of the scheme in principle, there is the potential for impacts that will require</p>	

Reference	Relevant Representation	Highways England Response
	<p>detailed consideration through the examination process ahead of any final decision on the Development Consent Order. Matters of particular interest to the District Council through the examination stage are considered to be:</p> <ul style="list-style-type: none"> • Access to the Food Enterprise Park • Landscape and visual impact • Impacts arising from noise, air quality and vibration. • Impacts on designated heritage assets 	
RR-041.4	<p>Access to Food Enterprise Park The Food Enterprise Park (FEP) (referred to as the Food Enterprise Zone (FEZ) in the application documents) is a 100 acre development site, the first 46 acres of which benefits from a Local Development Order to encourage and support food production, processing and agriculture through the co-location of commercial enterprises. The FEP is considered to be a strategically important employment site which has the potential to support significant economic growth in Greater Norwich and Norfolk more generally. Earlier iterations of the Scheme proposed by Highways England included provision of a spur off the southern most roundabout at the proposed Norwich Road junction. This spur would have allowed direct access to be provided from the FEP onto the strategic road network. In previous responses to the scheme the Council has made clear that direct access to the strategic road network is an integral element of delivering the FEP vision in its entirety and would be extremely supportive of this. Direct access into the FEP as previously proposed would avoid the need for vehicles associated with the FEP (including heavy goods vehicles) to use local roads and would make the FEP a more attractive prospect for future occupants thereby accelerating the delivery of the site and its associated economic benefits. If an access to the FEP is not provided at this point there is likely to be an unacceptable increase in heavy goods movements through the village of Easton. The scheme, as submitted, does not facilitate direct access from the strategic road network into the FEP and Highways England have adopted the position that they are not responsible for its provision, nor is its provision necessary to deliver the FEP. The Council would continue to request that the Scheme includes this important access.</p>	<p>The Applicant has explained its reason for not providing a connection to Blind Lane within Section 9.3 of the Scheme Design Report, Rev.1, (AS-009).</p> <p>The Applicant acknowledges that during statutory consultation, in March 2020, the initial design concept proposed the Norwich Road junction with a side road connection to Blind Lane; see Consultation Report Annex J - Section 47 Consultation Materials (APP-034).</p> <p>However, statutory consultation feedback raised concerns about the provision of a link to Blind Lane in light of Local Development Order requiring the closure of Blind Lane and the provision of a link for the benefit of the private developers of the Greater Norwich Food Enterprise Zone (FEZ).</p> <p>Therefore, the Applicant reviewed the legal position and determined there is no existing or contingent requirement that the LDO requires the Greater Norwich FEZ site to be accessed directly from the A47 given the approved alternative route along Church Lane. The analysis is set out in Section 9.3 of the Scheme Design Report, Rev.1, (AS-009) and the removal of Blind Lane post statutory consultation is reported in Table 4.12 (item no. 12) of the Consultation Report (APP-024).</p> <p>The FEZ developer was invited to contribute funds to the Scheme to provide a private direct connection to the FEZ, but as no offer was received before design was fixed for the DCO assessments so the Blind Lane connection remained removed from the Scheme design.</p> <p>However, the Applicant acknowledges that the developer of the FEZ site may wish to obtain consent to create their own connection to the Scheme in the future. Therefore, A47 Scheme's traffic modelling has taken this into account at the Norwich Road junction to provide capacity for the FEZ vehicle movements. The design of the Honingham roundabout to Norwich Road junction side road would allow for a third party to create a new highway connection. This commitment is presented in Section 9.3 of the Scheme Design Report, Rev.1 (AS-009).</p>

Reference	Relevant Representation	Highways England Response
		<p>The Applicant notes that the promoters of the FEZ have now lodged a planning application (27th July 2021) with the Local Planning Authority, Broadland District Council (Application No.: 20211335) for the provision of an access to the proposed scheme.</p>
RR-041.5	<p>Landscape and Visual Impact The key landscape issues are considered to be:</p> <ul style="list-style-type: none"> • Impacts of scheme on existing vegetation; hedgerows and trees • Effect of the engineering and landform on the landscape character, in particular the relatively gentle landform. • Whether there are significant adverse visual effects for sensitive receptors, e.g. users of PROWs, that cannot be sufficiently mitigated • Appropriateness of proposed Environmental Masterplan 	<p>The Applicant acknowledges the key issues identified by the Broadland District Council and confirms these are considered in Environmental Statement Chapter 7 Landscape and Visual Effects (APP-046).</p> <p>These will be considered when developing the final landscaping design under DCO Requirement 5 'Landscaping' (APP-017) and the detailed Landscape and Ecology Management Plan (LEMP), which forms Appendix B.5 of the Environmental Management Plan (APP-143), during the detailed design stage prior to construction.</p> <p>The relevant local planning authority will be consulted on the LEMP and the detailed landscaping scheme. This is secured in the draft Development Consent Order (APP-017) by Requirement 4 'Environmental Management Plan' and 5 'Landscaping'.</p>
RR-041.6	<p>Hedgerows and Arboricultural implications: The Council welcome that the submission has identified where 'important' (and other) hedgerows will be lost as a result of the scheme. Where it is necessary to remove sections of 'important' hedgerows for construction working margins – and the 'importance' was due to an historical line, it would be preferable to have the line re-instated after construction by replanting (if the original form of the land is unchanged). There is inevitable tree loss as a result of this scheme which is impossible to avoid in such a landscape. The Council are pleased to see that whilst some category 'A' trees are scheduled for removal, no Veteran trees appear to be implicated. The Council are concerned about potential construction compounds being within root protection areas of retained trees (including category As); would like to see this avoided if at all possible.</p>	<p>During the detailed design of the Scheme, the Applicant will continue to avoid or minimise any impact to important hedgerows. However, the Applicant notes Broadland District Council's request that where 'important' hedgerows are removed for construction and the 'importance' was due to an historical line, it would be preferable to have the line re-instated after construction by replanting (if the original form of the land is unchanged).</p> <p>With regards potential construction compounds being within root protection areas of retained trees, action LV3 in the record of environmental actions and commitments (REAC), which forms Table 3.1 in the Environmental Management Plan (EMP) (APP-143), requires the Principal Contractor to engage an arboricultural consultant to complete an arboricultural method statement. The method statement shall include, but not limited to the following:</p> <ul style="list-style-type: none"> ○ Tree protection measures in compliance with BS5837:2012 (Trees in relation to design, demolition, and construction – Recommendations) during the construction phase. ○ Maintenance and monitoring requirements of the tree protection measures. ○ Schedule of trees to be removed and based on the Environmental Masterplan, Rev.1, (AS-007) and ES Appendix 7.7 Arboricultural Impact Assessment (APP-

Reference	Relevant Representation	Highways England Response
		<p>094).</p> <ul style="list-style-type: none"> ○ Tree root protection zones. ○ Contingency plan (chemical spillage, collision, emergency access to the root protection zone). <p>Delivery of this commitment is secured in the draft Development Consent Order by Requirement 4 'Environmental Management Plan' (APP-017).</p>
RR-041.6	Landscape Character: Significant adverse effect on landscape character is anticipated within the Broadland section of the scheme, but the mitigation is expected to reduce this within 15 years to not be significant.	The Applicant welcomes Broadland District Council confirming the mitigation would reduce the significant adverse landscape and visual effects, within 15 years, to not be significant.
RR-041.7	Visual Effects: Significant adverse visual effects are anticipated within the Broadland section of the scheme, but the mitigation is expected to reduce these within 15 years to not be significant.	
RR-041.8	Environmental Masterplan: The sensitive design and integration of hard landscape features, such as barriers requires careful consideration. Notwithstanding the highway maintenance requirements, it would be preferable for fencing in more visible locations to be set with planting that will soften the built elements.	<p>The Applicant notes Broadland District Council's request to carefully consider the sensitive design and integration of hard landscape features, plus preference for fencing in more visible locations to be set with planting that will soften the built elements.</p> <p>These will be considered when developing the detailed Landscape and Ecology Management Plan (LEMP), which forms Appendix B.5 of the Environmental Management Plan (APP-143), during the detailed design stage prior to construction.</p> <p>The relevant local planning authority will be consulted on the final landscaping scheme and LEMP. This is secured in the draft Development Consent Order (APP-017) by Requirement 4 'Environmental Management Plan' and 5 'Landscaping'.</p>
RR-041.9	<p>Impacts arising from Noise, Air Quality and Vibration</p> <p>Whilst the project is in a predominantly rural area, the scheme has the potential to impact on the amenity of local residents during the construction and operational phases as a result of noise, emissions and vibration. Although the Council raises no specific issues on these matters at this stage, we may wish to make representations on these issues through the examination process and ensure that these issues are adequately addressed in the Development Consent Order.</p>	<p>The Applicant can confirm these impacts and mitigation requirements have been considered in the following chapters of the Environmental Statement (ES):</p> <ul style="list-style-type: none"> • Chapter 5 - Air quality (APP-044) • Chapter 11 - Noise and vibration (APP-050) • Chapter 12 - Population and human health (APP-051) • Chapter 13 - Road drainage and the water environment (APP-052) • Chapter 14 - Climate (APP-053). • Chapter 15 – Cumulative Effects Assessment (APP-054).
RR-041.10	<p>Impact on Heritage Assets</p> <p>The Council notes that the Scheme would have a large adverse impact on St Andrew's Church, a Grade II* listed building, identified by the applicant as having a high level of</p>	<p>The Applicant confirms the lych gate and churchyard will not be affected physically. Environmental Masterplan, Rev.1, (AS-007) drawing sheet 11 shows a proposed footpath and</p>

Reference	Relevant Representation	Highways England Response
	<p>heritage value. The Council does not disagree with this assessment. However, the Council notes that the existing pedestrian access into the church yard is currently from a footpath through a lychgate. The proposed landscaping (Environmental Masterplan Sheet 11 of 14 TR010038/APP/6.8) does not appear to be designed for retaining pedestrian access through lychgate. The Council consider this an important issue when considering consequential changes around the church as a result of the roads construction and further design consideration in relation to access to the church is therefore required.</p>	<p>grass verge at grade, which would allow foot access through the gate, via the grass verge. However, the Applicant has recognised that this would not be as accessible as a paved connection from the proposed highway footpath to the path passing under the lychgate.</p> <p>There is an existing path leading from the church entrance to the existing highway footpath, via the lych gate. Therefore, the Applicant will amend the proposed design to incorporate a paved link between the proposed highway footpath and the existing footpath passing under the lych gate; this does not materially change any of the application assessments and will be reflected in the updated DCO plans (APP-004 to APP-016, as required) and Environmental Masterplan, Rev.1, (AS-007) to be issued at Deadline 2 or Deadline 3. The existing footpath is in fair condition and it is envisioned that there will be no need to conduct works on the lych gate itself or on any other part of the grounds of St Andrew's Church (NHLE1170701).</p> <p>For the sake of clarity, the structural assessment and monitoring measures outlined in sections 6.9.13 and 6.9.14 of the Environmental Statement Chapter 6 – Cultural Heritage (APP-045), following industry best practice, is intended to include the lych gate as part of St Andrew's Church.</p>
RR-041.11	<p>In the Cultural and Heritage section of the ES, the applicants have not included a C19 lodge to Honingham Hall (to the east of St Andrew's Church) which the Council considers to have sufficient heritage and architectural interest to be a non-designated heritage asset (due to its historic connection to the hall and typical example of a C19 lodge).</p> <p>However, the Council considers that the diversion of the road will be beneficial to the setting of this building so is not a cause of concern.</p> <p>The Council supports the protection of milestones during the construction of the Scheme as is proposed by the applicant.</p>	<p>Though not separately listed Environmental Statement Appendix 6.1 - Cultural Heritage Information (APP-085) mentions the lodge in paragraph 6.3.96 in relation to Church Farm House (NHLE 1051542) and Barn at Church Farm (NHLE 1170764):</p> <p><i>"...There is a three to five-foot tall red brick wall from Taverham Road along the A47, forming the southern boundary of the garden and for Honingham Park. The fence then continues to seven-foot tall brick and stone gate piers for a gate lodge to Honingham Hall. These elements of the setting illustrate the connection of the farm complex to the park and hall and make a positive contribution to the setting."</i></p> <p>The Applicant concurs that the diversion of the Scheme will be beneficial to the setting of this building so is not a cause of concern. However, the value of these features is recognized in the Action CH2 of the Environmental Management Plan (APP-143) which required the gateway piers and southern boundary of Honingham Park (MNF49020) between St Andrew's Church and Taverham Road to be recorded prior to any works taking place and the gate piers protected during construction works. Action CH2 also excludes certain assets in the DCO boundary from the</p>

Reference	Relevant Representation	Highways England Response
		<p>works and to be recorded and protected during construction (for example with fencing). These assets include the milestone opposite St Andrew's Church (MNF62797).</p> <p>Delivery of Action CH2 is secured in the draft Development Consent Order by Requirement 4 'Environmental Management Plan' (APP-017).</p>
RR-041.12	<p>The decision maker should, as required by Section 66 (1) of the Planning (Listed Buildings & Conservation Areas) Act 1990, have special regard to the desirability of preserving the setting of the building or any features of special architectural or historic interest which it possesses.</p>	<p>The Applicant would direct the Examining Authority to Section 7.4.6 of the Case for the Scheme (APP-140) where this issue is explored in regards to compliance with Paragraphs 5.131 and 5.132 of the National Planning Policy for National Networks (2014).</p>
RR-041.13	<p>Conclusion The Council is strongly supportive of the scheme in principle subject to further consideration of the issues identified above. The Council wishes to continue to work pro-actively with the applicants as the application is progressed through to Examination to try to resolve any issues in respect of the above.</p>	<p>The Applicant acknowledge the Council's comments and hope the above responses helps address any concerns raised; a Statement of Common Ground will be provided to the Examining Authority as a record of issues agreed or still under discussion.</p> <p>The Applicant will continue to engage with the Council during the detailed design, construction and operation of the Scheme.</p>

APPENDIX D – APPLICANT’S COMMENTS ON COUNCIL’S RESPONSES TO THE EXAMINING AUTHORITY’S FIRST WRITTEN QUESTIONS

Broadland District Council’s responses to the Examining Authority’s First Written Questions are available at:

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010038/TR010038-000561-DL2%20-%20Broadland%20District%20Council%20-%20Responses%20to%20the%20ExAs%20First%20Written%20Questions.pdf>

Note the below responses refer to South Norfolk Council as the questions were the same apart from the addition of the Food Enterprise Zone question, so the responses were not duplicated.

No	ExA Question	Council's Response	Applicant's Comment
Q2.0.5	ES Chapter 5: Air Quality [APP-044] paragraph 5.4.10, are the parties happy with the approach taken with regards to PM2.5? If not, please explain.	Given the evolving but uncertain position and the focus now on reducing long term average concentrations of PM2.5 South Norfolk Council is of the opinion that it would be helpful if the applicant could use modelling to demonstrate the impact, if any, of the proposed development for this pollutant.	ES Chapter 5 Air Quality (APP-045) has provided full details of the assessment methodology and conclusions, including use of modelling to demonstrate the impact of the Scheme for this pollutant. The dispersion modelling of the baseline PM10 has shown that the predicted concentrations are significantly below the Air Quality Objective (AQO), and thus following DMRB methodology there is no need to further assess this pollutant. This model has been fully verified following LAQM TG(16). PM2.5 makes up around 60% of PM10 dependent on the source of the emissions. The ES has shown that there is no risk to the PM10 objective being exceeded even if all of the PM10 was PM2.5 the modelling confirms that there is also no risk to the current PM2.5 AQO and therefore, there is no requirement to undertake further monitoring.
Q4.0.6	ES Chapter 14: Climate [APP-053] paragraph 14.5.2 please explain what levels of maintenance are expected?	South Norfolk Council has no objection to the approach subject to the levels of maintenance not being likely to materially affect the baseline calculations.	The levels of maintenance are not likely to materially affect the baseline calculations, as stated in paragraph 14.5.2 of ES Chapter 14 Climate (APP-053).
Q5.0.5	At paragraph 4.17.11 of the SoR [APP-021], the Applicant does not consider the presence of the unimplemented Local Development Order to be a risk or an impediment to the Scheme. What is BDC's view of this statement?	<p>Broadland District Council consider that you can't describe the Local Development Order (LDO) as 'unimplemented'.</p> <p>The LDO is in place for an initial 15 years from its adoption and two buildings are currently being delivered 'under' the LDO.</p> <p>Direct access to the strategic road network is an integral element of delivering the FEP vision in its entirety and improved access will help to expedite the delivery of the FEP. If an access to the FEP is not provided in the vicinity of Blind Lane there is likely to be an unacceptable increase in heavy goods movements through the village of Easton.</p>	<p>The Applicant agrees that the LDO has been implemented and the Statement of Reasons (REP2-010) will be updated accordingly to reflect this. The Applicant still considers that the presence of the LDO is not a risk or an impediment to the Scheme, particularly as the LDO does not include an existing or contingent requirement that requires the Food Enterprise Partnership (FEP) to be accessed directly from the A47.</p> <p>The Applicant has considered the access to the FEP in more detail in section 9.3 of the Scheme Design Report (AS-008) and sets out analysis as to why a direct access to the A47 is not required. This is also set out in paragraph 4.17 of the Statement of Reasons (REP2-010).</p> <p>The LDO made by Broadland District Council (BDC) on 31</p>

No	ExA Question	Council's Response	Applicant's Comment
		<p>The Council would continue to request that the A47 Scheme includes this important access and helps facilitate its delivery.</p> <p>The operators of the FEP have submitted a planning application to Broadland District Council for a proposed access into the FEP in the vicinity of Blind Lane and to tie in with the proposed A47 scheme. Application reference 20211335.</p>	<p>October 2017 required a vehicular access route to the FEP to be approved prior to commencement of development pursuant to condition 2.20 of the LDO as well as the closure of Blind Lane. The route via Church Lane was approved by BDC on 21 December 2018 and has therefore been the intended route since that date. As such, there is no requirement for the Scheme to provide an access over and above what has been approved to-date by BDC.</p> <p>The Applicant notes that developers of the FEP have submitted a separate planning application for access into the FEP and to tie in with the A47.</p>
7.0.33	Art41: What are the respective parties' views of the imposition of a date of 24 July 2020?	Broadland District Council and South Norfolk Council are not sure why it is this date in particular, but don't have a particular issue with it.	This is the date the arboricultural survey was carried out, therefore any Tree Preservation Orders made after this date will not be known to the Applicant and have not been considered as part of the DCO application.
10.0.2	Are the parties satisfied with the Environmental Masterplan [APP-138] and the indicative proposals shown for the Proposed Development?	<p>These remarks were offered previously, but do not appear to have been considered:</p> <ul style="list-style-type: none"> • Reservations about the proposed formal approach to planting around the Eastern pedestrian/cycle bridge; this is not an urban area as the annotation suggests. • Will it be possible to view St Peter's Church Easton from the pedestrian/cycle crossing and/or its approach(es)? If not, is this desirable/possible? • What is the function of the spur of former Church Lane to the north of the proposed Easton pedestrian/cycle bridge? Is this necessary? 	<p>The Council's comments were addressed in the following responses in the Applicant's Response to the Relevant Representations (REP1-013):</p> <ul style="list-style-type: none"> • RR-057.9 • RR-057.10 • RR-057.11
10.0.13	ES Chapter 7: Landscape and Visual Effects [APP-046], Table 7.6 - are the assumptions around tree heights for Yr15 reasonable? If not,	Whilst the anticipated heights are potentially achievable, it would be useful to have information about the likely species within each category as there could be exceptions to the heights	For the purposes of assessment, Year 15 is considered a reasonable estimate of the time taken for proposed mitigation planting to reach a level of maturity that it will provide a level of landscape and visual mitigation such that an accurate

No	ExA Question	Council's Response	Applicant's Comment
	<p>please explain.</p>	<p>suggested.</p> <p>Our experience is that hedgerow plantings at year 1 are commonly shorter than stated at no more than 0.45m.</p>	<p>assessment of residual effects, i.e. effects following the establishment of mitigation, may be carried out.</p> <p>The assumptions around tree heights in Table 7-6 are considered to be reasonable. The nature of planting growth is not an exact science and trees will be planted at different specifications (i.e. size and nursery growth type) to ensure variety. In addition, different species of trees demonstrate different growth rates and the varying ground and climatic conditions throughout the site will give rise to further differences in the growth rates that will be achieved. However, it is safe to assume that after 15 years areas of proposed woodland trees, which comprise the majority of the proposed tree planting, will reach an approximate 8m in height. This assumes an approximate height of 0.6m when planted and a subsequent growth rate of 0.5m per annum.</p> <p>Additional detail regarding the planting types and sizes (heights) will be considered further when developing the final landscaping design under DCO Requirement 5 'Landscaping' (REP2-005) and the detailed Landscape and Ecology Management Plan (LEMP), which forms Appendix B.5 of the Environmental Management Plan (APP-143), during the detailed design stage prior to construction.</p> <p>The relevant planning authority will be consulted in the final landscaping scheme and LEMP that will be delivered as commitments through dDCO Requirements 4 'Environmental Management Plan' and 5 'Landscaping' (REP2-005).</p>
<p>Q12.0.1</p>	<p>ES Chapter 11: Noise and Vibration [APP-050] are the parties satisfied that the baseline conditions as identified in Section 11.7 is accurate? Have all the receptors been correctly identified? If not, please explain.</p>	<p>South Norfolk Council consider that the applicant should provide further information about their reasoning in Appendix 11.4 and in particular in para11.1.9.</p>	<p>ES Appendix 11.4 (APP-092) provides a discussion regarding the baseline noise survey and the effects of the global Covid-19 pandemic on measured road traffic noise levels.</p> <p>Table 11.4-1 of ES Appendix 11.4 demonstrates that 24 hour traffic flows during the survey were 10% less than a typical month before the pandemic (September 2019). When applying the Calculation of Road Traffic Noise methodology (required by DMRB LA111) this reduction in traffic flow would be associated</p>

No	ExA Question	Council's Response	Applicant's Comment
			<p>with a 0.5 dB $L_{A10,18hr}$ reduction in road traffic noise across the 18 hour period (06:00 to 00:00). This is a negligible change and the therefore the effect of the pandemic on measured road traffic noise levels obtained in September 2020 is deemed to be negligible when compared to a typical month before the pandemic.</p> <p>Paragraph 11.1.9 presents a summary of the differences between the Do Minimum Opening Year calculated road traffic noise levels and the measured road traffic noise levels obtained during the survey. The average difference between road traffic noise levels measured during the survey at the long-term measurement positions and the road traffic noise model results is +1.6 dB. This is considered to be a good correlation and the road traffic noise model was considered to be robust for use in the environmental impact assessment for the Scheme.</p>
Q12.0.2	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.4.3, are the parties satisfied with the changes to the assessment methodology from the scoping report? If not, please explain why.	Has the applicant considered para 3.50 of LA 111Rev2 when determining Table 11.2 of APP-050? Our understanding is that the parameters in Table 3.49.1 are not fixed.	<p>Paragraph 3.50 was one consideration borne in mind within the assessment of significance presented in Table 11.16 of ES Chapter 11 (APP-050).</p> <p>When considering the type of receptors that were potentially subject to a significant effect due to operational noise, no modification to the LOAEL or SOAEL values (either an increase or reduction in these values) was considered appropriate.</p>
Q12.0.3	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.4.11 are the parties satisfied with this approach? If not, please explain why.	Please see Q12.0.1 above	Please see response to Q12.0.1 above
Q12.0.6	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.7.3 are the parties content with the way the	Please see Q12.0.1 above	Please see response to Q12.0.1 above

No	ExA Question	Council's Response	Applicant's Comment
	appellant has addressed the issue of undertaking surveys during the COVID19 pandemic? If not, why not.		
Q12.0.10	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.9.6 are the parties content with the triggers for the implementation of temporary mitigation? If not, please explain why.	Childhood First are expressing concern about impacts on their residents at Merrywood House. South Norfolk Council are not familiar with current discussions but would hope that effective mitigation or other measures will be provided to avoid distress.	<p>The Applicant has, and is continuing to, engage with Childhood First to manage their concerns relating to the construction works in the field north of Merrywood House.</p> <p>The effects of noise and vibration associated with the construction and operation of the Scheme were considered and discussed within ES Chapter 11.</p> <p>In terms of operational noise, the Scheme is expected to result in negligible change in road traffic noise at Merrywood House and no significant operational noise effects are expected.</p> <p>In terms of construction noise, further mitigation was identified as being required in Table 11.12 in relation to the pre-works stage (National Grid gas main diversion). With further mitigation as detailed in Action NV1 in Table 3.1 of the Environmental Management Plan (APP-143), secured via Requirement 4 of the dDCO (REP2-005), no significant effects are expected due to construction noise.</p> <p>Noise from construction shall also be subject to Action G1 within Table 3.1 of the Environmental Management Plan. This requires that works outside of normal working hours are discussed with the local planning authority and appropriate methods of mitigation (including for noise and vibration) agreed with the local planning authority. Therefore, the relevant local planning authority will have the opportunity to review noise mitigation measures for night-time works should these be unavoidable during the construction period for the Scheme.</p>
Q12.0.12	ES Chapter 11: Noise and Vibration [APP-050] paragraph 11.9.29 are the parties satisfied with the justifications provided for the	It would appear that the applicant has explored a barrier for Hall Farm and cottages, Honingham, 442m long x 3m high and that due to the topography presumably this does not provide	A noise barrier was considered at this location as part of the noise impact assessment, as discussed further in paragraph 11.9.29 of ES Chapter 11 (APP-050).

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	<p>exclusion of these mitigation measures from the proposed scheme? As a result, do the parties consider that the proposed noise barriers are in accordance with NPS NN as mitigation measures that are considered to be proportionate and reasonable? If not, please explain why.</p>	<p>worthwhile attenuation.</p>	<p>The effect of the barrier of a significant length and height was to reduce road traffic noise levels by between 0 and 2 dB. This was not sufficient to influence the impact magnitude or conclusion with regard to the significance of operational noise effects. Therefore, this barrier was not proposed at this location since it is not a proportionate or reasonable mitigation measure.</p> <p>Mitigation in the form of a low-noise surface along the length of the Scheme has been included; but is not sufficient to avoid significant adverse noise effects in this location.</p> <p>With the Scheme, road traffic noise levels are expected to range from 55 to 58 dB $L_{A10,18hr}$ at these receptors and are therefore below the SOAEL.</p> <p>Good indoor conditions (defined within the WHO Guidelines for Community Noise and British Standard 8233:2014) within these receptors would be achieved with a building envelope that provides a level difference of approximately 21 dB. This would be achieved where the external walls to habitable rooms incorporate an open trickle vent and 6 mm single glazed windows that are closed. For this reason, no significant adverse health effects are expected on the occupants due to this level of road traffic noise and the provision of secondary glazing is not considered necessary.</p>
Q13.0.1	<p>ES Chapter 12: Population and human health [APP-051] are the parties satisfied with the assessment methodology? If not, please explain.</p>	<p>In 2018 the World Health Organisation published health based Environmental Noise Guidelines for road traffic noise for the whole day (53 dB L_{den}) and for night time (45 dB L_{night}) BDC and SNC believes it would be helpful if an assessment could be carried out to determine the effect of the applicant's proposal by comparing noise levels from the existing road with the proposed completed road using the noise units above.</p>	<p>The WHO Environmental Noise Guidelines for the European Region (2018) set out recommendations for protecting human health from exposure to environmental noise including road traffic noise. This includes the guideline value of 53 dB L_{den} for road traffic noise. This guideline was derived primarily with reference to studies on annoyance and road traffic noise, and was established as the point at which 10% of population is "highly annoyed" when considered a best-fit line through a wide range of different studies from different countries. It is noted that different studies presented in Figure 6 of the WHO guidelines demonstrated the threshold of 10% "highly</p>

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			<p>annoyed” at a wide range of different road traffic noise levels varying from 40 dB L_{den} to 75 dB L_{den}. This guideline applies outdoors and is therefore not an appropriate measure for assessing indoor health effects (since building sound insulation performances and therefore indoor noise levels vary from building to building).</p> <p>Road traffic noise levels with the Scheme are shown graphically within ES Figures 11.5 (for the opening year) and 11.6 (for the future year) (APP-074). Predicted road traffic noise levels are expressed in terms of dB L_{A10,18hr}, as required by DMRB LA111. For locations where road traffic noise is the dominant source of noise, the L_{den} parameter is approximately equivalent to the dB L_{A10,18hr} parameter when using the TRL Conversion Method referenced in ES Chapter 11.</p> <p>Based on the above assumption, dwellings within approximately 400 m of the Scheme will be subject to road traffic noise levels that are above the recommended threshold within 2018 WHO Environmental Noise Guideline of 53 dB L_{den}. This is not unusual in context of research carried out by the European Environment Agency that estimates that more than 100 million people in Europe are exposed to L_{den} levels above 55 dB; for night-time road traffic noise, over 72 million Europeans are exposed to L_{night} levels above 50 dB (Blanes et al., 2017). Dwellings within approximately 300 m of the existing A47 at Honingham will currently be subject to road traffic noise levels that are above the recommendations within 2018 WHO Environmental Noise Guideline of 53 dB L_{den}.</p> <p>The assessment of potentially significant effects within ES Chapter 11 (APP-050) considers both expected change in road traffic noise with the Scheme as well as the absolute road traffic noise level with the Scheme versus the effect levels within DMRB LA111. The significance of operational road traffic noise is then presented within Table 11.16.</p>

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Q15.0.1	<p>ES Chapter 13: Road drainage and the water environment [APP-052], are the parties content with the Applicant's Flood Risk Assessment (FRA) and drainage proposals? If not, please explain why and what additional information is required.</p>	<p>South Norfolk Council is concerned to ensure that the development poses no risk to private drinking water supplies. It was noted in Appendix 13.4 para 2.45 that the applicant has made a request to SNC for details of private water supplies in the vicinity but had not received a response to this request. We will look back at our records to see whether we can clarify what occurred and in the meantime will provide the applicant and the Inspector with information concerning boreholes and wells that we are aware of. Whilst we will make every effort to assist, our view is that it is for the applicant to determine the location of all private water supplies. Our records are not complete and it might be necessary to ask property owners to confirm whether they have a private supply for example. Once every effort has been made to determine locations the applicant should assess whether the development might pollute the supplies taking account of the drainage proposals both in normal operation and in situations such as accidents and tanker spillages for example.</p>	<p>The Applicant welcomes South Norfolk Council's offer to provide information concerning unlicensed abstractions.</p> <p>At the detailed design stage, the Applicant will undertake a water features survey to confirm the details of unlicensed abstractions and additional water features (including additional abstractions) in the vicinity of construction works. The Drainage Strategy (APP-126 and APP-127) has considered groundwater pollution risk (HEWRAT) and mitigation has been proposed.</p> <p>Delivery of this commitment is specified in actions RD3 and RD5 in Table 3.1: Record of Environmental Actions and Commitments of the Environmental Management Plan (APP-143) which will be delivered under dDCO (REP2-005) Requirement 4.</p>
Q15.0.3	<p>ES Chapter 13: Road drainage and the water environment [APP-052], do the parties agree that section 13.7, baseline conditions, is an accurate assessment of the current situation? If not, why not.</p>	<p>Please see answer to 15.0.1</p>	<p>Please see response to Q15.0.1 above</p>